

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CHANGE HEALTHCARE,
INC. CUSTOMER DATA
SECURITY BREACH LITIGATION**

MDL No. 24-3108 (DWF/DJF)

**JOINT STIPULATION REGARDING
SUBMISSION DEADLINES**

This Document Relates to All Actions

Provider Plaintiffs and Patient Plaintiffs (Plaintiffs) and Defendants, through undersigned counsel, (collectively, “the Parties”) stipulate to the following subject to Court approval:

Whereas, on February 4, 2025, the Court ordered the Parties to submit motions related to disputed categories of Early Discovery by February 27, 2025 and then to submit responses to any motions by March 6, 2025. *See* Dkt. No. 193.

Whereas, on February 19, 2025, the Court ordered the Parties to submit motions related to the entry of an ESI Protocol and a Protective Order by February 28, 2025. *See* Dkt. No. 215.

Whereas, the Court set a hearing via Zoom on March 18, 2025 at 10 a.m. CDT for argument on the discovery issues.

Whereas, the Parties have met and conferred about these issues and believe that a short extension of the deadline to file motions and briefs on these issues will allow the Parties to further meet and confer in an effort to resolve disputes and to better focus their disagreements for the Court to resolve, if any.

Whereas, the Parties agree that the Court should vacate the current deadlines and establish a new schedule as follows:

The parties shall continue to meet and confer. On March 11, 2025, the Parties shall file (i) motions to adopt an ESI Protocol and a Protective Order, and (ii) a joint submission setting forth the Parties' agreed or disputed issues regarding an ESI Protocol, Protective Order, and Early Discovery. Given the parties are filing a joint submission setting forth their positions on any disputed issues in the ESI Protocol, Protective Order, and Early Discovery, no response briefs are necessary or permitted.

The Court will hear argument on any remaining issues at the Zoom argument currently scheduled for March 18, 2025 at 10 am CDT.

It is so stipulated and agreed.

Dated: February 27, 2025

/s/ Daniel E. Gustafson

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